

PETERSON BAKER, PLLC  
701 S. 7th Street  
Las Vegas, NV 89101  
702.786.1001

TAMARA BEATTY PETERSON, ESQ., Bar No. 5218  
tpeterson@petersonbaker.com  
PETERSON BAKER, PLLC  
701 S. 7th Street  
Las Vegas, NV 89101  
Telephone: 702.786.1001  
Facsimile: 702.786.1002

Thomas C. Hardy, SBN 6294305 (*pro hac vice*)  
thardy@reedsmith.com  
REED SMITH LLP  
10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, IL 60606-7507  
Telephone: 312.207.1000  
Facsimile: 312.207.6400

*Attorneys for Defendant Rocky Mountain Hospital  
and Medical Service, Inc. dba Anthem Blue Cross and  
Blue Shield*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

STEVEN P. BRAZELTON, an Individual,  
NATHALIE HUYNH, an Individual, and JHB,  
an individual,

Plaintiffs,

vs.

ROCKY MOUNTAIN HOSPITAL AND  
MEDICAL SERVICE, INC., a Colorado  
Corporation doing business as HMO Nevada,  
Anthem Blue Cross and/or Blue Shield; HMO  
Colorado, INC., a Colorado Corporation doing  
business as HMO Nevada, Anthem Blue Cross  
and/or Blue Shield; BLACK CORPORATIONS  
1-10, and DOES I-X, Inclusive,

Defendants.

Case No: 2:24-cv-00994-GMN-BNW

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFFS' MOTION TO  
COMPEL DISCOVERY**

(Third Request)

Defendants ROCKY MOUNTAIN HOSPITAL AND MEDICAL SERVICE, INC., and  
HMO COLORADO, INC. (collectively "Defendants"), by and through their attorneys of record,  
Peterson Baker, PLLC and Reed Smith LLP, and Plaintiffs STEVEN P. BRAZELTON, NATHALIE

1 HUYNH, and JHB, by and through their attorneys of record, Bighorn Law (collectively “Plaintiffs”),  
2 hereby stipulate and agree, subject to the Court’s approval, to extend the deadline for Defendants to  
3 respond to Plaintiffs’ Motion to Compel Defendants’ Compliance with Fed. R. Civ. P. 26(f) (ECF  
4 No. 38).

5 **Procedural Background**

6 1. On March 8, 2025, Plaintiffs filed their Motion to Compel Defendants’ Compliance  
7 with Fed. R. Civ. P. 26(f) (“Motion”). ECF No. 38.

8 2. The Parties met and conferred concerning Plaintiffs’ Motion on April 1, 2025 with the  
9 intent of potentially narrowing or resolving the issues subject to the Motion. Since that time, the  
10 Parties have continued communications concerning these issues.

11 3. Currently, the deadline for Defendants to respond to the Motion is April 23, 2025, in  
12 accordance with the Court’s April 4, 2025 Order. *See* ECF No. 44.

13 4. The Parties stipulate that the deadline for Defendants’ response be extended to May  
14 14, 2025. Plaintiffs’ Reply in Support of their Motion shall be due seven days after the service of  
15 Defendants’ response to the Motion. LR 7-2(b).

16 **Reasons Why an Extension Is Necessary**

17 5. The Parties believe that conferring further on the issues subject to Plaintiffs’ Motion  
18 would be beneficial in order to determine if the issues can be resolved or narrowed without judicial  
19 intervention.

20 6. In addition, the Parties are exploring options and taking steps to narrow the issues in  
21 light of the Parties’ meet and confer on April 1, 2025 and their subsequent communications. The  
22 Parties anticipate conducting another meet and confer within the next week and to continue  
23 discussions on the issues subject to the Motion thereafter.

24 7. Defendants also require additional time in order to prepare evidence in support of their  
25 response to the Motion and would likely save additional resources in the preparation of such evidence  
26 if the Parties were to agree on some of the issues that are the subject of the pending Motion.

This stipulation is without prejudice to either Party, is made in good faith, with good cause, and not for the purpose of unduly delaying discovery or trial. This is the third request to extend the time to file a response to the Motion.

**IT IS SO STIPULATED.**

**DATED:** April 23, 2025.

PETERSON BAKER, PLLC

BIGHORN LAW

/s/ Tamara Beatty Peterson  
TAMARA BEATTY PETERSON, ESQ.  
Bar No. 5218  
tpeterson@petersonbaker.com  
PETERSON BAKER, PLLC  
701 S. 7th Street  
Las Vegas, NV 89101  
Telephone: 702.786.1001  
Facsimile: 702.786.1002

/s/ Joshua P. Berrett  
JOSHUA P. BERRETT, ESQ.  
Bar No. 12697  
josh@bighornlaw.com  
BIGHORN LAW  
3675 W. Cheyenne Avenue, Ste. 100  
North Las Vegas, Nevada 89032  
Telephone: 702.333.1111

Thomas C. Hardy, SBN 6294305 (*pro hac vice*)  
thardy@reedsmith.com  
REED SMITH LLP  
10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, IL 60606-7507  
Telephone: 312.207.1000  
Facsimile: 312.207.6400

*Attorneys for Plaintiffs*

*Attorneys for Defendant Rocky Mountain  
Hospital and Medical Service, Inc. dba Anthem  
Blue Cross and Blue Shield*

While the Court GRANTS the parties' stipulation, it is not inclined to grant future continuances. IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 25, 2025

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